

September 25, 2007

RE: 03-123

Federal Communications Commission
via web

To Whom It May Concern:

SUBJECT: COMMENT

I am writing in regards to the above listed proceeding number on the subject of the Non-Compete Agreement required by Sorenson Communications for their Video Relay Service Interpreters.

These agreements are appalling. They serve as a rather effective monopoly practice. For those interpreters who would use VRS as their primary method of income, Sorenson lures interpreters to them with offers of high pay. However, many interpreters are subsequently driven away by the dismal working conditions and poor management. Unfortunately, there are many more interpreters who are trapped in their working situation because they would have no income options for a 12-month period (the length of time required in the Non-Compete Agreement) should they choose to leave. This significantly reduces the already low number of interpreters available to work in the VRS setting.

Sorenson claims their actions are justified by the "10,000 dollars required to train each interpreter". Not only is this a gross inflation of the actual costs, but it is erroneous reasoning. Instead of a non-compete clause, they could easily require that the interpreter pay for the cost of training or be held financially liable should the interpreter not work a minimum number of hours or length of time. Sorenson is trying to use the alleged high cost of training to dupe the governing bodies of VRS into allowing this reprehensible hiring practice to continue.

I would urge the FCC to make non-compete agreements a thing of the past. Allowing the practice to continue only perpetuates the monopoly that Sorenson holds on the industry.

I thank you for your time.

Sincerely,

Andrea K. Smith, CI, CT
American Sign Language Interpreter
www.andreasmithinterpreting.com